



**California State
Automobile Association**

150 Van Ness Avenue
P.O. Box 429186
San Francisco, CA 94142-9186

May 12, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

**Re: Industrial Telecommunications Association
Informal Request for Certification
RM-10687**

Dear Ms. Dortch,

California State Automobile Association (CSAA) submits these comments opposing the January 27, 2003 Informal Request for Certification filed by the Industrial Telecommunications Association, Inc.(ITA). In its Informal Request, ITA seeks authority to coordinate the Automobile Emergency Radio Service (AERS) frequencies, as well as other "quasi-public safety" frequencies.

CSAA is a not-for-profit organization that has been providing emergency road services since 1900. CSAA serves approximately 4 million members in Northern California, Nevada and Utah. CSAA responds to over 4.5 million emergency road service calls per year from motorists facing a wide variety of problems, many of which endanger the safety of drivers and their passengers. CSAA maintains dedicated telephone lines linked directly to the California Highway Patrol, and each year CSAA handles several thousand incidents at the request of this as well as numerous public safety agencies.

Relying on the efficiency of its radios, CSAA quickly dispatches towing operations to the scene of motor vehicle accidents or breakdowns so that road hazards can be cleared before secondary collisions occur. CSAA also assists motorists who are stranded or involved in accidents, and transports them from roadside and highways where they may otherwise be vulnerable to harm from high-speed vehicles or crime. Without question, CSAA's prompt response to roadside emergencies saves lives and property.

Congress has emphasized the need for prompt emergency roadside assistance, citing a study that shows "while deaths from motor vehicle crashes have been declining in recent years, deaths at the scene [of an accident] prior to the arrival of emergency medical care have more than doubled in the past 20 years, totaling more than 20,000 [fatalities] per year."¹ These findings demonstrate that the public has a compelling need for reliable automobile emergency services provided by CSAA and its other AAA affiliated auto clubs.

The use of radios to coordinate emergency road response is vital. In the case of CSAA, spectrum scarcity has forced us to design systems that "reuse" AERS channels to the greatest extent possible, through careful engineering and the use of minimal required power. We have always relied on the American Automobile Association (AAA) to coordinate our use of the AERS frequencies, because AAA frequency coordinators are not just "familiar" with our operations, but have *expertise* concerning the radio operations involved in emergency road service. This is because AAA is first and foremost the nation's largest emergency road service and highway safety organization, and handles AERS frequency coordination's as an extension of this primary mission. AAA has consistently provided us with fast and reliable coordination service. Neither ITA nor any other frequency coordinator has the required expertise with the AERS channels. We cannot be assured that any other competing frequency coordinator will provide (or have the incentive to provide) this same level of protection. While ITA and other coordinators are generally driven by a profit motive, AAA is a not-for-profit entity concerned with the safety of public roadways.

In this regard, we are concerned by the "mass production" approach employed by large coordinators such as ITA, as a way to reduce costs and enhance speed of service. ITA's *Informal Request for Certification* (at page 7) claims that AERS systems "are identical to the systems that ITA has and continues to coordinate for our members and clients." This statement ignores the specialized nature of AERS systems, and indicates that our AERS coordination proposals will simply be "thrown into the hopper" and processed in the same fashion as an application for laundry truck radios. This fear is reinforced by ITA's argument (at page 10) that competition in the coordination of AERS frequencies is appropriate because "a majority of communications systems in the radio services 'are used in a similar fashion – for support of day-to-day business activities' ". While the AERS channels are part of the larger Industrial/Business frequency pool, AERS operations are *not* used in a similar fashion to the majority of Industrial/Business radio systems. The majority of our communications deal with the retrieval of our members from a dangerous accident or breakdown scene, and the removal of disabled vehicles that create delays and the hazard of secondary collisions for the entire public. This is why the FCC designated AAA as the exclusive coordinator for AERS frequencies in 1999. Like AAR, UTC, and API, as well as the Public Safety Pool coordinators, AAA provides a public safety function; and its AERS coordinations need to look at more than just which channel has fewest mobiles licensed.

¹ See H.R. Report No. 105-768, pt. 1 at 10 (1998).

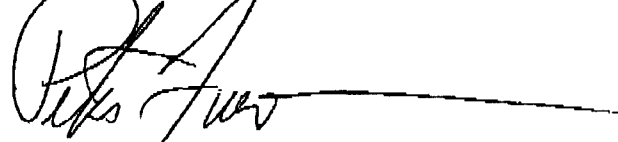
AAA recognizes the importance of AERS operations, and is intimately familiar with the unique usage patterns and priority of communications associated with these operations. What may be viewed as "acceptable loading" on a typical Industrial/Business channel is not necessarily acceptable on an AERS channel, since AERS vehicles must stay in constant contact with the dispatcher, and in some cases with public safety officials. AAA helps to ensure that these important communications take place on an interference-free basis, by using a realistic assessment of the demands placed on a channel by AERS operators, and by avoiding the licensing of inconsistent users on the same channel.

In contrast, we had several negative experiences during the period when the AERS frequencies have been coordinated by entities other than AAA. In particular, CSAA had to file numerous requests for denial or dismissal of applications filed with the Commission by other coordinators, because of the potential harm to AERS operations. See, e.g., April 29, 1999 Request for Dismissal filed against K. Kurian application for 452.5625 MHz (File No. D117655); April 12, 2000 Request for Dismissal filed against Spectrum Wireless, Inc. application for 150.8975 MHz (File No. D123496); May 16, 2000 Request for Dismissal of Eden Communications, Inc. application for 150.920 and 150.935 MHz (File No. A046333). In several cases, the protests were against commercial operators who simply applied to acquire as many channels as they could in a given area, without apparent regard for the compatibility of their operations with AERS systems. Such operators generally ask for the greatest power possible, which confounds our frequency re-use efforts. In the San Francisco Bay area, there are channels that we cannot effectively use because of incompatible systems licensed through a coordinator other than AAA.

The need for AAA's exclusive expertise in coordinating the AERS channels is even more evident because of the increased risks of terror in the wake of the September 11, 2001 attacks. San Francisco and the rest of Northern California are particularly dependent on its highway system. If a terrorist attack took place in this area, it would be vital that AERS systems could operate without interference, because the highways are the primary evacuation routes, and must be kept clear of incidents. Aside from the terrorism threat, the risk of earthquakes in the San Francisco Bay area demands effective emergency road service operations. This fact was demonstrated during the 1989 earthquake. CSAA is a member of the Northern California Regional Incident Management Program. CSAA also responds to emergency requests from public service agencies such as the California Division of Forestry, and the Red Cross. During one earthquake, CSAA served as a back-up command post and replacement police transmitter site for a local law enforcement agency.

In conclusion, CSAA is completely satisfied with the speed, cost and quality of coordination service received from AAA. We see no need for additional coordinators in the AERS band, and we are concerned that multiple coordinators for the AERS channels will only recreate the licensing issues that CSAA spent considerable resources battling before AAA gained exclusive coordination rights. For these reasons, we urge the Commission to deny the ITA Informal Request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter Fuerst", with a long horizontal line extending to the right.

Peter Fuerst, Supervisor
Emergency Road Services

cc: FCC Commissioners
Chief, Wireless Telecommunications Bureau